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April 3, 2024

Via FedEx

Hon. Orelia E. Merchant, U.S.D.J.
United States District Judge, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Leticia Francine Stidhum v. 161-10 Hillside Auto Ave LLC d/b/a Hillside Auto
Outlet *et al.*
Case No.: 21-cv-7163**

Dear Judge Merchant,

We represent the Defendants in the above-referenced matter. In accordance with Rule III(F)(3) of this Court's Individual Practice and Rules, enclosed please find courtesy copies of Defendants' Reply in Support of its Motion for Summary Judgment. A breakdown of the contents are below:

ECF Docket Entry 99 – Defendants' Notice of Motion for Summary Judgment

ECF Docket Entry 100–Defendants' Memorandum in Support of Motion for Summary Judgment

ECF Docket Entry 101- Defendants' Rule 56.1 Statement of Undisputed Facts

ECF Docket Entry 102- Defendants' Affidavit/Declaration in Support of Motion for Summary Judgment

Exhibit A – New York State Department of State's Division of Corporations entity information of 161-10 Hillside Ave, LLC d/b/a Hillside Auto Outlet;

Exhibit B – Defendants' Supplemental Responses to Plaintiff's First Set of Interrogatories dated March 7, 2023;

Exhibit C - New York State Department of State's Division of Corporations entity information of Hillside Auto Mall Inc. d/b/a Hillside Auto Mall;

Exhibit D – Copy of text messages between Plaintiff and others at Hillside Auto Outlet;

Exhibit E – Plaintiff's Complaint dated December 29, 2021;

Exhibit F – Plaintiff's payroll records Bates stamped D1186-D1250;

Exhibit G – Plaintiff's criminal records related to uttering forged instruments;

Exhibit H – transcript of the Deposition of Deanna Jennings, a corporate representative of 161-10 Hillside Auto Ave, LLC

d/b/a Hillside Auto Outlet and Hillside Auto Mall d/b/a Hillside Auto Mall, dated March 10, 2023;

Exhibit I – Transcript of the Deposition of Ishaque Thanwalla, dated February 24, 2023;

Exhibit J – Transcript of the Deposition of Andris Guzman, dated March 9, 2023;

Exhibit K – Transcript of the Deposition of Leticia Francine Stidhum, dated February 17, 2023;

Exhibit L – Transcript of the Deposition of Jory Baron, dated March 3, 2023;

Exhibit M – Declaration of Serge Zanaan, dated October 10, 2022.

ECF Docket Entry 103 – Defendants’ Reply in Support of Motion for Summary Judgment

ECF Docket Entry 104 – Defendants’ Rule 56.1 Reply to Counter Statement of Material Facts in Support of Motion for Summary Judgment

ECF Docket Entry 105 – Plaintiff’s Memorandum in Opposition to Defendants’ Motion for Summary Judgment

ECF Docket Entry 106 – Plaintiff’s Affidavit in Opposition to Defendants’ Motion for Summary Judgment

Exhibit 1 – Affidavit of Leticia Stidhum;

Exhibit 2 – Deposition Transcript of Leticia Stidhum;

Exhibit 3 – Deposition Transcript of Ishaque Thanwalla;

Exhibit 4 – Deposition Transcript of Andris Guzman;

Exhibit 5 – Deposition Transcript of Jory Baron;

Exhibit 6 – Deposition Transcript of Corporate Witness Deanna Jennings;

Exhibit 7 – Text Messages between Leticia Stidhum and Ishaque Thanwalla;

Exhibit 8 – D1187-D1250 Paystubs of Plaintiff Leticia Stidhum;

Exhibit 9 – Supplemental Responses to Interrogatory 7;

Exhibit 10 – D1253-1447 Paystubs of Comparators; and

Exhibit 11 – Jennings’ Jackson Affidavit

Exhibit 12 – Additional Supplemental Declaration of Jennings

Exhibit 13 – Plaintiff’s Counter 56.1 Statement

We thank the Court for its consideration of this matter.

Respectfully submitted,
MILMAN LABUDA LAW GROUP PLLC
/s/ Joseph M. Labuda
Joseph M. Labuda, Esq.

Encl.

cc: Magistrate Lois Bloom and all counsel of record (Via ECF)